

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

NATHAN ROBERTS and FREEDOM
TRUCK DISPATCH LLC, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

PROGRESSIVE PREFERRED INSURANCE
COMPANY; PROGRESSIVE CASUALTY
INSURANCE COMPANY; CIRCULAR
BOARD LLC,

Defendants.

Civil Action No. 1:23-cv-01597

JUDGE PATRICIA A. GAUGHAN
Magistrate Judge James E. Grimes, Jr.

**MOTION FOR THE ADMISSION,
PRO HAC VICE, OF EFRÉN C.
OLIVARES AS COUNSEL FOR
*AMICI CURIAE***

Pursuant to Local Civil Rule 83.5(h), I hereby move for the admission, *pro hac vice*, of Efrén C. Olivares, an attorney at the Southern Poverty Law Center located at 150 E. Ponce de León Ave., Ste. 350, Decatur, GA 30031-1287 and a member in good standing of the Georgia state bar (GA Bar No. 934358), as counsel in this case for *Amici Curiae* The Southern Poverty Law Center, the National Hispanic Bar Association, and Asian Americans Advancing Justice. The declaration of Efrén C. Olivares is filed herewith.

Date: December 21, 2023

Respectfully submitted,

s/ Efrén C. Olivares

Efrén C. Olivares (GA Bar No. 934358)
SOUTHERN POVERTY LAW CENTER
150 E. Ponce de León Ave, Ste. 350
Tel: (404) 821-6443
Fax: (404) 221-5857
Email: efren.olivares@splcenter.org

CERTIFICATE OF SERVICE

I certify that, on December 21, 2023, I electronically transmitted the attached MOTION FOR THE ADMISSION, PRO HAC VICE, OF EFRÉN C. OLIVARES AS COUNSEL FOR *AMICI CURIAE*, its accompanying declaration, and proposed order using the CM/ECF system. Notice of Electronic Filing will be sent to all CM/ECF registrants for this matter.

Signed: *s/ Efrén C. Olivares*

Efrén Olivares (GA Bar No. 934358)
SOUTHERN POVERTY LAW CENTER
150 E. Ponce de León Ave, Ste. 350
Tel: (404) 821-6443
Fax: (404) 221-5857
Email: efren.olivares@splcenter.org

*Attorney for Amici Curiae The Southern Poverty
Law Center, Hispanic National Bar Association,
and Asian Americans Advancing Justice – AAJC*